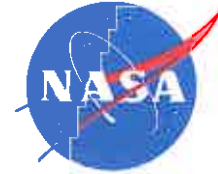


National Aeronautics and Space Administration  
George C. Marshall Space Flight Center  
Marshall Space Flight Center, AL 35812  
December 10, 2012



Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/Audrey D. Robinson

SUBJECT: Approval for NASA Employees With Senior Institutional or External Relations Responsibilities to Attend the Apollo 17 Mission 40<sup>th</sup> Anniversary Tribute

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

Certain NASA employees with senior institutional or external relations responsibilities have been invited to attend the 40<sup>th</sup> Anniversary Tribute to the Apollo 17 mission. This event is scheduled for Tuesday, December 11, 2012, at the U.S. Space & Rocket Center Davidson Center for Space Exploration. There will be a cocktail reception at 5:30 p.m., followed by dinner at 6:00 p.m., and a program with Apollo 17 Astronaut and Geologist Dr. Harrison "Jack" Schmitt and Mars Astrogeologist and Space Camp Hall of Fame member, Dr. James W. Rice.

This event will be a widely-attended gathering of NASA and military members, state and local elected officials, academia, private industry, as well as other community leaders. The event is valued at \$50.00 per person and approximately 250 people are expected to attend. This event is sponsored by the U.S. Space and Rocket Center Foundation. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

Attendance of NASA employees with senior institutional or external relations responsibilities at this event would be in the best interest of NASA, since it will further NASA programs and operations. NASA personnel invited to attend this event have, or may soon have, duties that involve frequent interaction with the U.S. Space and Rocket Center (USSRC) and may substantially affect the USSRC's interests.<sup>1</sup>

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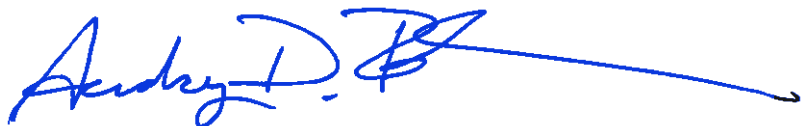
<sup>1</sup> Based on the invitation list provided, those personnel, identified by position, are: MSFC Center Director, Deputy Director, Associate Director, SLS Director, OSAC Director, External Relations Manager, and MSFC Liaison to USSRC.

I have determined that attendance of these senior institutional and external relations leaders at the Apollo 17 Mission 40<sup>th</sup> Anniversary Tribute is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with state and local business and governmental leaders, enhance community relations, and support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the reasonable market value of the event, I have determined that the value to the agency in having these senior institutional and external relations leaders attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties. Accordingly, NASA employees in the positions identified above may accept free attendance at the event for themselves and for a spouse or guest.

The U.S. Space and Rocket Center is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.

A handwritten signature in blue ink, appearing to read "Audrey D. Robinson", with a long horizontal flourish extending to the right.

Audrey D. Robinson  
Chief Counsel